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July 28, 2021

**Via ECF**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

***Re: HC2, Inc. v. Andrew Delaney  
Civil Action No. 20-cv-03178-LJL***

Dear Judge Liman:

On behalf of HC2, Inc., I write with a status update as per the Court's July 21, 2021 Order. Defendant declined to file a joint letter.

With regard to the matter *In re Andrew J. Delaney*, No. 1-20-44372 (Bankr. E.D.N.Y.), the Eastern District of New York Bankruptcy Court has not lifted the stay. HC2 has filed a motion in Mr. Delaney's bankruptcy case to withdraw the proof of claim that it filed, to which motion Mr. Delaney has indicated his consent. We expect that the Bankruptcy Court will enter an order for this withdrawal within the next week or so. However, the Bankruptcy Court has not lifted the automatic stay, nor has Mr. Delaney, who has other creditors, been granted a discharge at this time.

We will advise this Court if we learn of additional updates in regards to the automatic stay.

Respectfully Submitted,

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

*s/ Michael Nacchio*

Michael Nacchio

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